

#### **Iowa Department of Human Services**

## lowa's Disability Employment Services Redesign Update





Preparation, Participation, Power



## **During June 2013**

Community Conversations held across the state (Atlantic, Storm Lake, Ames, Ottumwa, and Waterloo) seeking input from a broad range of stakeholders

Held in collaboration with Iowa Vocational Rehabilitation Services (IVRS), the Iowa DD Council, and the ICIE Coalition

Facilitated by Dale Verstegen, TransCen, Inc.; 152 Attendees

Took applications for Workgroup participants; sought a balance of rural-suburban-urban, large and small providers, those who do only facility based services, those who do community based only, those who do both and everything in between

## Workgroup Participants

**ASK Resource Center** 

Candeo

**CASS** Incorporated

Christian Opportunity Center

**County Social Services** 

**Easter Seals** 

Exceptional Persons, Inc.

Funders: DHS-IME, DHS-MHDS,

IVRS, IDB, IWD, Magellan

Genesis

Goodwill of the Heartland

Hope Haven, Inc.

Hope Haven Area Dev. Corp.

**Horizons Unlimited** 

Nishna Productions

North Iowa Vocational Ctr.

Parents, family members

SE Iowa Case Management

**Story County Community Life** 

Systems Unlimited

U of Ia Center for Disability and

Development (CDD)

#### **Workgroup Activities**

30 participants represented a wide range of interested stakeholders

Intense all-day work sessions two times per month in central lowa, with homework in between

Employment service definitions: July 11 & 23

Provider requirements, staff qualifications, staff training: August 8 & 13

Reimbursement Methodologies: September 10 & September 26, October 8 & 31

#### **Community Feedback Webinars held to date:**

July 26, 2013 August 28, 2013 September 25, 2013

Intended to update the public on the workgroup's efforts, and to provide any interested stakeholder the opportunity to give constructive feedback and express any concerns or opinions regarding the redesign process and the proposed changes to the disability employment service system. Offered opportunities to ask questions and add to the online FAQs.

## Key Policies and Principles

- Employment First Principles
- The Americans with Disabilities Act
- Iowa's Olmstead Plan
- State Employment Leadership Network (SELN) Funding Study and a sample rate model developed for Iowa
- Office of Disability Employment Policy (ODEP) recommendations
- Center for Medicare and Medicaid Services (CMS)
   September 2011 Home and Community Based Waiver Application guidance regarding Employment Supports and Day Habilitation
- Current IVRS reimbursement structure
- US Dept. of Justice actions and direction in other States

## **Prevocational Services**

#### **Current Definition**

Prevocational habilitation services include teaching concepts such as compliance, attendance, task completion, problem solving, and safety. Services are not oriented to a specific job task, but instead are aimed at a generalized result. Services shall be reflected in the member's comprehensive service plan and shall be directed to habilitative objectives rather than to explicit employment objectives.

#### **Proposed Changes**

- Fee for Service
- Facility Based Rate
- Community Based Rate 15 min and hourly
- Staff Ratios
- Adopt CMS Definitions and Activities
- Time limited service when member is not engaged in job development
- Reauthorization requirements
- Members must engage in a period of career exploration
- Plan for members to transition who do not wish to pursue integrated employment

# Prevocational service provider standards and staff qualifications

- HS Diploma or equivalent
- Age 18 for Direct Support staff,
- Age 16 with on-site supervision
- Within 6 months of hire, professional development opportunities must include 9.5 or \_\_\_\_ number of hours of online training and pass with 80%; should have background of community integration values (not indicated in current training), and produce evidence of competency-based training.
- Providers must have policies and procedures regarding consumer's rights, medication, identifying child abuse and dependent adult abuse
- Add CQL accreditation to make all waivers consistent.

## **Supported Employment**

#### **Current:**

#### SE Supports to Maintain Employment

- Job Coaching
- Workplace Personal Care
- Enclave (group of 2 to 8 workers)

Services include individual work related behavioral management, Job coaching, on-the-job or work-related crisis intervention, assistance in the use of skills related to sustaining competitive paid employment, including: assistance with communication skills, problem solving, and safety. Assistance with time management, assistance with appropriate grooming, employment-related supportive contacts, on-site vocational assessment after employment, employer consultation.

#### Proposed: Individual & Group SE

Adopt CMS Definition and Activities.
Individual Employment Supports and Small
Group Employment Supports may include:

- Benefits Planning
- Career Exploration
- Job related discovery
- Trial work experiences
- Person centered Employment planning
- Development of resumes
- Job Seeking Skills training and support
- Outreach to prospective employers on behalf of the member (job development, employer development)
- Job analysis
- Identifying & arranging for transportation
- Career advancement
- Reemployment Services
- Asset Development and Other employment support services deemed necessary to enable the member to obtain employment

## Supported Employment

#### **Current**

Supports to Obtain...
Supports to Maintain...

#### **Proposed**

Individual and Group Supported Employment

- 15 min units
- Outcome payment for specified milestones

- Job Development
- Employer Development
- Enhanced Job Search

Covered under both individual and group employment supports

## **Day Habilitation**

#### Current

- Day habilitation" means assistance with acquisition, retention, or improvement of self-help, socialization, and adaptive skills.
- a. Scope. Day habilitation activities and environments are designed to foster the acquisition of skills, appropriate behavior, greater independence, and personal choice. Services focus on enabling the member to attain or maintain the member's maximum functional level and shall be coordinated with any physical, occupational, or speech therapies in the comprehensive service plan. Services may serve to reinforce skills or lessons taught in other settings
- ID Waiver: Day habilitation services may include training families in treatment and support methodologies or in the care and use of equipment. Family training may be provided in the consumer's home.

#### **Proposed**

- Align pre-voc and day hab training (career exploration/discovery) in services/career exploration strategies.
- Phase down facility based day habilitation. States will be given a set timeframe to come into compliance – for example, possibly 2017.
- Benefits planning services embedded
- Fee for service
- Adopt CMS Definitions and Activities
- Add language clarifying that the service shall be provided in integrated community settings

## Day Habilitation

#### Current

Unit of service the unit of service is 15 minutes (for up to 16 units per day) or a full day (4.25 to 8 hours per day).

#### d. Exclusions.

- (1) Services shall not be provided in the member's home, except as provided in paragraph "b." For this purpose, services provided in a residential care facility where the member lives are not considered to be provided in the member's home.
- (2) Services shall not include vocational or prevocational services and shall not involve paid work.
- (3) Services shall not duplicate or replace education or related services defined in Public Law 94-142, the Education of the Handicapped Act

#### **Proposed**

- Include supported retirement as a covered activity for people age 60 or older
- Include Career Planning as a covered activity for working age members
- Day habilitation may not provide for the payment of services delivered in a sheltered workshop or other similar facility-based employment program.
- A participant's ISP may include two or more types of non-residential habilitation services (e.g. prevocational services, supported employment, day habilitation); however, more than one service may not be billed during the same period of time (e.g. the same hour).

## SELN Sample Rate Model p.1

	SERVICE	1:1 Individual SE				Group SE		Prevoc		Day Hab		
	POSITION	ETS/Job Coach		Job Coach		Job Coach		Direct Service		Direct Service		
								Professional		Professional		
State Employment Leadership Network	Functions							Benefits		Benefits		
		Benefits Plan &						Education;		Education;		
		Analysis; Discovery		Career				Career		Career		
		Assessment; Job		Exploration,				Exploration;		Exploration;		
		Development; Job		Career Plan				Facility based		Community		
		Placement; Employer		Development;				Prevoc;		Day Hab;		
		Development; Initial		Job Coaching;		Job Coaching;		Workplace		Workplace		
		Training t	ning to Stabilization "		"Follow Along"		Follow-Along		Personal Asst		Personal Asst	
Annualized Wage												
Employee related expenses		35%		35%		35%		35%		35%		
Mileage cost: miles/year at												
.39/mile		6000	2,340	3000	1,170	3000	1,170	0	0	0	0	
Program support & program		30%		30%		50%		50%		50%		
Total annual cost/staff person												
Billable Hours												
Hours available @ 37.5/week			1,950		1,950		1,950		1,950		1,950	
Vac/holiday/sick @ 32 days			240		240		240		240		240	
Training /staff development hrs			40		32		32		24		24	
Available hours			1,670		1,678		1,678		1,686		1,686	
Billable hours*		70%	1,169	80%	1,342	80%	1,342	80%	1,349	80%	1,349	

## SELN Sample Rate Model p.2

SERVICE	1:1 Individual SE		1:1 ongoing		Group SE		Prevoc		Day Hab	
POSITION	ETS/Job Coach		Job Coach		Job Coach		DSP		DSP	
Staff Ratios / Ranges		1 to 1		1 to 1	1 to 1	1 to 8	1 to 1	1 to 8	1 to 1	1 to 8
* Weekly Billable Hours: 37.5,										
less these items:	37.5		37.5		37.5		37.5		37.5	
One-on-one supervision time	1		1		1		1		1	
Non-billable time (meetings,										
travel, notes)	5.25		4		4		4		4	
Productivity adjustment	1.5		1.5		1.5		1.5		1.5	
Team meetings	1		1		1		1		1	
Non-billable job development	2.5									
Total non-billable hours	11.25		7.5		7.5		7.5		7.5	
Percent non-billable	30%		20%		20%		20%		20%	

# Doing Now: Determining what are appropriate numbers to test for cost neutrality?

- Workgroup recommendations:
  - Minimums? Maximums? Averages? 75th Percentile?
- SELN recommendations?
- ODEP recommendations?
- Numbers based on latest salary surveys? IACP, APSE, other?
- Salary numbers based on time-studies?
- Rate averages of "high performing" States? (lowa already has better rates than many of these)
- Current cost plus/minus a given factor?
- Test All of the above? Or some combination?

## **Next Steps**

- Continue working with SELN and ODEP experts to fine-tune proposed rate structure (model)
- Cost model out projections for blending/braiding IVRS/DHS
- Cost model out long term projections
- Apply sample rate models to current provider claims to determine impact
- Administratively model proposed rate structures to determine cost neutrality
- Meet with IME Provider Cost Audit unit and Fiscal staff to ensure understanding of the impact of changes, timelines for cost reporting
- DHS fiscal staff to conduct rate modeling to assure cost neutrality

### Next Steps...

- Meet with Leadership
- Finalize & format recommendations into "Waiver Language"
- Draft of entire Rule package
- Invite comments from consumer advocacy community (APSE, BIA-IA, DD Council, ICIE, Olmstead Consumer Taskforce...)
- Vet proposed rules through all stakeholders again prior to final submission to initiate the Administrative Rules review process
- Submission to CMS for approval

## What can you do?

- Visit the MHDS Employment Website <u>http://www.dhs.state.ia.us/mhdd/2012/Employment.html</u>
- Explore how your agency can be a part of the system redesign
- Ask how your business model today fits the funding realities of the future (Region, Medicaid, Managed Care, Other)
- Candidly express your fears and concerns, and offer solutions
- Continue to ask questions

## **Additional Resource Materials**

MHDS Employment Website:

http://www.dhs.state.ia.us/mhdd/2012/Employment.html Look towards the bottom of the page for these materials

**IVRS** Website:

http://www.ivrs.iowa.gov/

To learn more about ODEP's Employment First initiatives visit: <a href="http://www.dol.gov/odep/topics/EmploymentFirst.htm">http://www.dol.gov/odep/topics/EmploymentFirst.htm</a>

To learn more about the SELN visit:

http://www.selnmembers.org/homepage

## Send your questions, concerns and comments to:

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